



FILED

12/15/22

08:00 AM

A2212009

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company for Recovery of Recorded
Expenditures Related to Wildfire Mitigation,
Catastrophic Events, and Other Recorded
Costs.

Application No. 22-12-_____

(U 39 M)

**APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
FOR RECOVERY OF RECORDED EXPENDITURES RELATED TO
WILDFIRE MITIGATION, CATASTROPHIC EVENTS, AND
OTHER RECORDED COSTS**

SEAN P.J. COYLE
LAURA R. SEEGAL

Coblentz Patch Duffy & Bass LLP
One Montgomery Street, Suite 3000
San Francisco, CA 94104
Telephone: (415) 772-5794
E-mail: scoyle@coblentzlaw.com

WALKER A. MATTHEWS

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (925) 750-0041
Facsimile: (415) 973-5520
E-Mail: walker.matthews@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: December 15, 2022

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company for Recovery of Recorded
Expenditures Related to Wildfire Mitigation,
Catastrophic Events, and Other Recorded
Costs.

(U 39 M)

Application No. 22-12-_____

**APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
FOR RECOVERY OF RECORDED EXPENDITURES RELATED TO
WILDFIRE MITIGATION, CATASTROPHIC EVENTS, AND
OTHER RECORDED COSTS**

Pursuant to Article 2 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Public Utilities Code Sections 454, 454.9, 701 and 8386.4(b), Commission Decision (D.) 20-12-005 and related authorities, Pacific Gas and Electric Company (PG&E or the Company) respectfully submits this Application to recover a revenue requirement of \$1.3 billion (excluding interest) for expenditures related to wildfire mitigation, certain catastrophic events, and other activities. As explained further below in Section II, the costs under review in this Application have been recorded in various balancing and memorandum accounts approved by the Commission, subject to the reasonableness review thresholds and requirements established for the accounts. PG&E refers to this Application as the Wildfire Mitigation and Catastrophic Events application, or WMCE application for short.

I. OVERVIEW

In accordance with applicable law and policy, this Application seeks recovery for costs we have incurred for activities performed in response to extraordinary events and circumstances in our service area, and to make our employees and the customers we serve safer. As discussed below, these activities include: (1) completing wildfire risk mitigation work in accordance with our approved Wildfire Mitigation Plan (WMP); (2) responding to government-declared catastrophic events to repair damaged facilities, restore utility services, and protect our

employees and customers; and (3) implementing various customer-focused initiatives. The bulk of the costs at issue in this Application are for activities conducted in 2021, with some catastrophic event activities also performed in 2019 and 2020.

A. Wildfire Risk Mitigation and Vegetation Management Activities

California continues to experience extreme climate change, resulting in increased temperatures, drought, increasingly dry conditions, high winds, and longer and more destructive wildfire seasons. PG&E is committed to reducing wildfire risk to keep customers and communities safe. In 2021, PG&E completed several important wildfire related safety enhancements and investments in accordance with our WMP to continue progress toward these vital objectives, consistent with state policy. The wildfire mitigation work under review in this proceeding includes:

- **Enhanced Vegetation Management (VM), Routine Vegetation Management, and Tree Mortality** – We continued to trim or remove trees with a higher potential for wildfire risk along distribution lines in HFTD areas, in addition to our Routine VM activities; we also continued to remove dead or dying hazard trees that may pose a public safety or wildfire threat or risk to our electric and power generation (PG) infrastructure;
- **Advanced Fire Modeling** – We advanced our fire modeling capabilities to more precisely forecast conditions necessitating Public Safety Power Shutoff (PSPS) events;
- **Safety Infrastructure Protection Teams (SIPT)** - We strategically placed teams with fire service training and experience, EMT response, and incident command to focus on fire prevention and protecting PG&E assets and infrastructure in high fire-threat areas;
- **Storm Outage Prediction Project (SOPP)** – We improved the granularity of weather modeling tools that enhanced our forecasts to predict outages and PSPS events using higher resolution data with a longer forecast horizon;
- **Improved PSPS** – We reduced the number of customers impacted by each PSPS, and enhanced operations, communication, and coordination before, during and after PSPS events; and

- **Microgrids** – We installed facilities in connection with microgrids to mitigate the impact of PSPS events on customers.

PG&E's proactive measures serve the important purposes of reducing fire risk, improving the safety of PG&E's electric system, and protecting customers and the public.

B. Response to Catastrophic Events

PG&E's CEMA response activities involved various functional areas and resulted in incremental costs beyond those recovered in PG&E's base rate proceedings such as the General Rate Case (GRC).

1. Wildfire and Weather-Related Events

In 2021, PG&E's service area had its second driest water year in the last century.¹ PG&E's entire service area experienced extreme and severe drought conditions through much of 2021 prior to the rainstorms that occurred in the latter part of the year. Large wildfires caused by lightning and other sources continued to occur throughout our service territory in 2021. We responded to these events with urgency to repair damaged electrical, gas, and PG facilities, and restore utility services to customers as expeditiously as possible. We completed these activities safely and reliably, with a focus on serving our customers, consistent with sound utility practices.

2. COVID-19 Pandemic

In 2021, the Coronavirus (COVID-19) pandemic continued to present significant challenges. Because of the pandemic, it was necessary for PG&E to comply with various public healthcare measures to protect the health and safety of PG&E's customers and employees and to help customers impacted economically during these times, while continuing to maintain the safe, continuous operation of our systems. During 2021, PG&E continued vital measures to protect employees, contractors, and customers impacted by the pandemic. As a result, PG&E incurred

¹ Water years run from October 1 to September 30. California Department of Waterworks, Water Year 2021: The Suspense Continues (Feb. 24, 2021) <<https://water.ca.gov/News/Blog/2021/February/Water-Year-2021-The-Suspense-Continues>> (as of Nov. 23, 2022).

incremental costs in various functional areas in response to the COVID-19 pandemic in 2021. These activities included, among other things: (1) supporting employees in a remote-work environment, (2) modifying facilities to comply with state and county health orders; (3) sequestering critical employees to maintain utility operations; and (4) purchasing cleaning supplies and other equipment (masks, shields, etc.) to protect employees from exposure to the virus.

C. Customer Care Initiatives

In 2021, PG&E continued various customer-focused initiatives, including: (1) protecting customers' private information in compliance with the California Consumer Privacy Act; (2) implementing emergency consumer protections during a government-declared emergency event that has resulted in a loss, disruption, or degradation of utility services; and (3) implementing billing-related protections for residential and small business customers impacted by the COVID-19 pandemic. Many of these activities respond to various legislative or regulatory requirements enacted after PG&E's 2020 GRC or were required by the Commission to be recorded in memorandum accounts subject to the Commission's review prior to cost recovery being authorized. As such, the costs for these activities are incremental to costs recovered in PG&E's GRC.

II. ACCOUNTS COVERED BY THIS APPLICATION

This Application requests reasonableness reviews of costs recorded in various balancing accounts and memorandum accounts, with the majority of the costs relating to wildfire mitigation activities recorded in the Wildfire Mitigation Balancing Account (WMBA), vegetation management activities recorded in the Vegetation Management Balancing Account (VMBA), and catastrophic event response activities recorded in CEMA. The vast majority of the recorded costs covered by this Application were incurred for activities conducted in 2021, with some CEMA response activities occurring in 2019 and 2020. Consistent with our approach in prior applications of this kind (i.e., Application (A.) 20-09-019 and A. 21-09-008), we are pursuing in a single proceeding the reasonableness reviews of multiple accounts in order to

minimize the administrative burden on the Commission and stakeholders that would otherwise result from the filing of separate applications. The combined review also provides greater transparency regarding PG&E's overall costs and potential customer rate impacts than would separate proceedings.

We acknowledge the significance of the cost recovery request in this Application and its impact on customer rates if approved. It is important, however, to measure these costs against the substantial customer benefits provided, including, among other things, reduced wildfire risks, increased public safety, and the continued safe and reliable operation of the electric system, in compliance with state and Commission policy objectives. The costs we present in this Application are for activities that are critically necessary to improve and maintain our system and provide safe, continuous quality and reliable service to our customers.

The following subsections summarize the costs included in this Application, organized by the balancing and memorandum accounts to which the costs have been recorded.

A. Wildfire Mitigation Balancing Account (WMBA)

The Commission authorized the WMBA in D.20-12-005² (2020 GRC Decision). The WMBA is a two-way balancing account used to track and record costs for PG&E's Community Wildfire Safety Program (CWSP). The CWSP costs recorded to the WMBA include both operations and maintenance (O&M) expenses, as well as capital expenditures incurred for certain wildfire mitigation activities outlined in PG&E's GRC³ and annual WMPs.⁴ The work recorded to this account was performed to mitigate the risk of catastrophic wildfires, increase public and customer safety and awareness, and more accurately predict the potential and spread of wildfire

² D.20-12-005, p. 396, Conclusion of Law (COL) 29 ("Authority to establish a two-way WMBA to record CWSP O&M and capital expenditures is supported by the record and should be authorized.")

³ See A.18-12-009, HE-16: Exhibit (PG&E-4), WP 2A-1 to WP 2A-3.

⁴ The WMP is filed or updated annually and comprehensively addresses PG&E's activities to reduce wildfire risk. See PG&E's 2021 Wildfire Mitigation Plan – Revised Report, Rulemaking (R.) 18-10-007 (June 3, 2021) (Revised 2021 WMP), available at: <www.pge.com/wildfiremitigationplan> (as of Sept. 7, 2021).

to inform our future mitigation plans and activities. These activities are critically important for PG&E to comply with state policy under Senate Bill (SB) 901 and Assembly Bill (AB) 1054 to mitigate the increasing risk of wildfire caused by climate change and drought conditions across California.⁵

The 2020 GRC Decision authorized PG&E to recover WMBA expenses up to 115 percent of the adopted values through a Tier 2 advice letter.⁶ PG&E must file a reasonableness review application to recover WMBA costs exceeding 115 percent of the GRC authorized amount or if PG&E's recorded average per mile unit costs for system hardening exceed 115 percent of the authorized unit costs.⁷ Costs up to 115 percent of the GRC authorized amount are considered just and reasonable and are not included in PG&E's request.⁸

The GRC-authorized (adopted) amount for 2021 WMBA costs is \$51.9 million, and the 115 percent reasonableness review threshold is \$59.7 million.⁹ PG&E's 2021 recorded WMBA costs totaled \$161.1 million, which is \$101.5 million over the reasonableness review threshold. Under this review framework authorized in the GRC, this Application seeks reasonableness reviews of recorded costs for the wildfire mitigation activities that were the drivers of PG&E's costs above the WMBA's 115 percent reasonableness review threshold: (1) Public Safety Power Shutoff (PSPS) activities, (2) Advanced Fire Modeling (AFM), (3) Storm

⁵ See also D.20-12-005, pp. 119-120 ("We generally find the five main programs under CWSP as well as specific programs and projects proposed under the five main programs reasonable and necessary.")

⁶ D.20-12-005, p. 413, OP 9. PG&E's 2021 WMBA costs up to 115 percent of the GRC-authorized amount were presented in Advice Letter Advice Letter 4392-G/6100-E, dated February 23, 2021. The advice letter became effective March 25, 2021.

⁷ D.20-12-005, p. 397, COL 32 ("PG&E should be required to file an application for recovery of CWSP costs recorded in the WMBA if CWSP expenditures are in excess of 115 percent of the authorized amount or if recorded per mile unit costs are in excess of 115 percent of the authorized unit costs."), p. 410, OP 1.b. PG&E's recorded average per mile unit costs for overhead and underground system hardening were less than 115 percent of the authorized per mile unit costs.

⁸ In accordance with OPs 8 and 9 of D.20-12-005, PG&E submitted Advice Letter 4392-G/6100-E to seek recovery of the VMBA expense undercollection of \$110.823 million and WMBA expense undercollection of \$7.600 million as authorized by D.20-12-005 OP 1.

⁹ D.20-12-005, p. 119.

Outage Prediction Project (SOPP), and (4) Safety and Infrastructure Protection Teams (SIPT). In accordance with the 2020 GRC Decision, PG&E demonstrates through this Application that \$101 million in costs for these WMBA activities (those exceeding the 115 percent threshold) were reasonably incurred.

Chapter 2 of our supporting testimony demonstrates the reasonableness of these costs.

B. Vegetation Management Balancing Account (VMBA)

The 2020 GRC Decision established the VMBA as a two-way balancing account used to track and record PG&E's VM costs for: (1) Routine VM, (2) Enhanced VM, and (3) Tree Mortality.¹⁰ Costs recorded to the VMBA are presumed to be reasonable up to 120 percent of the authorized amount, after which PG&E is required to file an application for a reasonableness review of the amount exceeding that threshold.¹¹

The work recorded to this account was performed to mitigate the risk of ignition caused by vegetation contacting electrical lines and components. In this Application, we seek approximately \$815 million, subject to reasonableness review, for incremental expenses recorded to the VMBA in 2021 that are in excess of the 120 percent reasonableness review threshold of \$723.4 million for the four categories of work authorized to be recorded to the VMBA.¹² The work completed under these VM programs supports public safety, service reliability, and regulatory compliance of PG&E's electric distribution facilities.

Chapter 3 of our supporting testimony demonstrates the reasonableness of these costs.

C. Catastrophic Events Memorandum Accounts

The purpose of the CEMA is to record costs for "(1) [r]estoring utility services to customers, (2) [r]epairing, replacing, or restoring damaged utility facilities and (3) [c]omplying with governmental agency orders in connection with events declared disasters by competent state

¹⁰ D.20-12-005, Section 14.1.5, p. 318.

¹¹ D.20-12-005, p. 395, COL 17.

¹² Enhanced VM overhang clearing and radial clearance work often exceeds compliance with General Order (GO) 95, Rule 35 and Public Resources Code (PRC) Section 4293.

or federal authorities.”¹³ In this Application, we seek recovery of incremental costs recorded in the CEMA totaling \$327 million. The majority of the CEMA incremental costs in this Application pertain to six events: the 2021 Caldor Fire, the 2020 Glass Fire, the October 2021 Northeast Pacific Bomb Cycle, the 2021 Atmospheric River, the 2021 Wind Event, and the 2021 December Storms. In addition, we have performed activities to mitigate the health and safety risks inflicted upon the public, customer, employees and contractors by the COVID-19 pandemic. Additionally, we seek to recover \$6 million for incremental costs, adjusted for avoided costs, to respond to the COVID-19 pandemic during 2021. The work associated with the Company’s response included coordination, employee support, transition to remote work, protective equipment, facility modifications, vehicle rentals and inspections, sequestration of critical employees, and cleaning.

Chapters 4-6 of our supporting testimony demonstrate the reasonableness of CEMA costs associated with our repair and restoration of facilities damaged during various weather-related and wildfire CEMA events, and in response to the pandemic.

D. Other Memorandum Accounts

Finally, this Application includes a request to recover \$120 million in incremental costs related to several additional memorandum accounts: the COVID-19 Pandemic Protections Memorandum Account (CPPMA); Disconnections Memorandum Account (DMA); Emergency Consumer Protections Memorandum Account (ECPMA); California Consumer Privacy Act Memorandum Account (CCPAMA); the Microgrids Memorandum Account (MGMA); and the Transmission Revenue Requirement Reclassification Memorandum Account (TRRRMA) which refunds customers an incremental (\$4.7 million) in revenue requirement.

1. California Consumer Privacy Act Memorandum Account (CCPAMA)

D.19-09-026 authorized PG&E to establish the CCPAMA.¹⁴ The purpose of the

¹³ Public Utilities Code Section 454.9(a).

¹⁴ D.19-09-026, p. 14, OP 1.

CCPAMA is to track and record costs associated with PG&E's actions to protect customers' private information in compliance with the CCPA.¹⁵ PG&E recorded \$2.4 million in expense and \$5.9 million in capital expenditures in the CCPAMA in 2021, and seeks a reasonableness review of those amounts in this Application.

Chapter 7 of our supporting testimony demonstrates the reasonableness of CCPAMA costs.

2. Emergency Consumer Protections Memorandum Account (ECPMA)

D.18-08-004 authorized PG&E to establish the ECPMA.¹⁶ The purpose of the ECPMA is to track and record incremental costs associated with PG&E's implementation of its Emergency Consumer Protection Plan. PG&E implements this plan when the California Governor's Office or the President of the United States declares a state of emergency due to a disaster that has either resulted in the loss or disruption of the delivery or receipt of utility service or resulted in the degradation of the quality of utility service as defined in D.19-07-015.¹⁷ PG&E recorded approximately \$2.2 million in expense in the ECPMA in 2021.

Chapter 7 of our supporting testimony demonstrates the reasonableness of ECPMA costs.

3. COVID-19 Pandemic Protections Memorandum Account (CPPMA)

Commission Resolution M-4842 directed PG&E to establish the CPPMA to track and record costs associated with implementing billing-related protections for residential and small business customers impacted by the COVID-19 pandemic.¹⁸ The costs recorded in the CPPMA are separate from CEMA costs related to COVID-19, which consist of PG&E's costs to respond

¹⁵ Civil Code §§ 1798.100 et seq.; AB 375 (2017-2018 Reg. Sess.), Ch. 55; SB 1121 (2017-2018, Reg. Sess.), Ch. 735.

¹⁶ D.18-08-004, p. 22, OP 3 (the decision directs PG&E to re-name its existing Wildfires Customer Protections Memorandum Account to the ECPMA to reflect the fact that the account includes emergency customer protections for other disasters, not only wildfires).

¹⁷ D.19-07-015, p. 16.

¹⁸ Res.M-4842, p. 12, OPs 2 and 4.

to the pandemic. In contrast, CPPMA costs involve customer-billing related protections. PG&E recorded approximately \$11.3 million to the CPPMA in 2021.

Chapter 7 of our supporting testimony demonstrates the reasonableness of CPPMA costs.

4. Disconnections Memorandum Account (DMA)

The purpose of the DMA is to track and record costs associated with implementing the requirements of D.20-06-003, which established various rules to reduce the number of residential customer disconnections and improve reconnection processes for disconnected customer.¹⁹ PG&E recorded approximately \$8.4 million to the DMA in 2021.

Chapter 7 of our supporting testimony demonstrates the reasonableness of DMA costs.

5. Microgrids Memorandum Account (MGMA)

D.20-06-017 approved various micro-grid related programs and authorized PG&E to track and record associated program costs in the MGMA.²⁰ The programs seek to mitigate the impact of PSPS events on customers and provide substantial customer benefits in that regard. PG&E recorded \$87.2 million in expense and \$2.9 million in capital expenditures in the MGMA in 2021.

Chapter 8 of our supporting testimony demonstrates the reasonableness of MGMA costs.

6. Transmission Revenue Requirement Reclassification Memorandum Account (TRRRMA)

The Commission approved the TRRRMA in Resolution E-3574, authorizing PG&E to: (1) record a CPUC revenue requirement associated with the costs requested by PG&E for recovery in transmission rates that are no longer deemed to be network transmission related- costs and, as such, are not allowed to be included in Federal Energy Regulatory Commission (FERC) transmission rates; (2) record, as a credit to the TRRRMA, any revenue requirement associated with costs already included in CPUC electric distribution rates, but

¹⁹ D.20-06-003, p. 2.

²⁰ D.20-06-017.

subsequently included in FERC transmission rates; and (3) include an allowance for Revenue Fees and Uncollectibles²¹ (RF&U) accounts expense. In this Application, PG&E proposes a customer refund of \$4.7 million to reflect a reduction in revenue requirement associated with changes recorded to the TRRRMA in 2021.

Chapter 9 of our supporting testimony demonstrates the reasonableness of the TRRRMA recorded revenue requirement change.

III. COSTS EXCLUDED OR REMOVED FROM THIS APPLICATION

We have excluded or removed the following costs from this Application.

A. Certain Overhead Reductions

Consistent with past practice in CEMA cost-recovery applications, we have excluded \$3.1 million in CEMA capitalized overheads from the CEMA costs presented in this Application. The overheads will be recovered in PG&E's GRC.

B. External Auditor Recommendations

As with PG&E's prior WMCE applications (filed in 2020 and 2021), Ernst & Young (EY) performed an analysis of the costs at issue from the WMBA, VMBA, and CEMA accounts to confirm the costs incurred were sufficiently supported, reasonable, and directly attributable to the balancing and memorandum accounts as they are captured in PG&E's financial systems. EY performed analytics across each population and developed specific testing procedures tailored to each category of cost based on its unique nature and associated risks. EY tested approximately \$419 million in costs, totaling 20 percent of those incurred.

EY found no material evidence that would raise questions relating to PG&E's conclusions that costs were: (1) incurred for the activities set forth in the corresponding, relevant CPUC-approved WMCE Accounts; (2) accurately recorded; and (3) there is no evidence of costs

²¹ Refer to Chapter 12. The revenue amount in this Application excludes RF&U. When this Application is approved by the Commission, PG&E will update the revenue requirement to include RF&U in accordance with the Commission approved preliminary statement discussed in Chapter 12.

recorded on more than one account.

EY identified items totaling approximately \$1.4 million (extrapolated to approximately \$3.15 million) that EY recommended PG&E remove from this Application. PG&E accepted EY's recommendation and has reduced the amounts requested in this Application accordingly.

Appendix A of our supporting testimony provides a copy of EY's report.

IV. RECORDED COSTS

The costs recorded in the balancing and memorandum accounts described above, as well as key categories of costs removed from this Application, are shown in the following tables.

Table 1 shows the costs recorded to the various balancing and memorandum accounts included in this Application:

**TABLE 1
SUMMARY OF REQUEST FOR INCREMENTAL COSTS
(THOUSANDS OF DOLLARS)**

Line No.	Chapter	Memo Accounts	Expense	Capital	Total
1	Chapter 2: Wildfire Mitigation	WMBA	\$101,457	–	\$101,457
2	Chapter 3: Vegetation Management	VMBA	814,724	–	814,724
3	Chapter 4: ED – CEMA	CEMA	185,084	\$130,070	315,154
4	Chapter 5: PG – CEMA	CEMA	4,856	1,180	6,036
5	Chapter 6: PG&E – COVID-19: CEMA	CEMA	5,902	–	5,902
6	Chapter 7: CC – Other Memorandum Accounts	CPPMA	11,266	–	11,266
7		DMA	8,480	–	8,480
8		ECPMA	2,214	–	2,214
9		CCPAMA	5,937	2,381	8,318
10	Chapter 8: ED – Microgrids	MGMA	87,213	2,855	90,068
11	Grand Total		\$1,227,134	\$136,485	\$1,363,620

- (a) TRRRMA is calculated based on Plant and Reserve balances for Capital and derived from a factor based on Plant for Operations and Maintenance Expense. Not reflected in the total costs above is the proposed incremental customer refund of a \$4.7 million revenue requirement associated with California Independent System Operator (CAISO) operational control designation changes in 2021 and plant activity from assets that changed CAISO operational control in 2020 that were recorded from January 1, 2021, through December 31, 2021 in the TRRRMA.
- (b) Costs reflected in Table 1 are adjusted costs. Please see Chapter 11 for details of adjustments.

Table 2 summarizes requested costs by PG&E organizational unit. As shown in the table, the majority of our request involves expenditures in Electric Operations (EO).

TABLE 2
SUMMARY OF REQUEST BY ORGANIZATION
(THOUSANDS OF DOLLARS)

Line No.	Electric	Customer Care	Other	Total
1	\$1,325,292	\$28,743	\$9,585	\$1,363,620

Note: Other costs consists of Shared Services and PG costs.

Table 3 converts the adjusted recorded costs at issue into PG&E's requested revenue requirement.

TABLE 3
SUMMARY OF REQUEST IN REVENUE REQUIREMENT
(THOUSANDS OF DOLLARS)

Line No.	Account	Expense	Capital	Total
1	Wildfire Management Balancing Account (WMBA)	101,457	-	101,457
2	Vegetation Management Balancing Account (VMBA)	814,724	-	814,724
3	Catastrophic Event Memorandum Account (CEMA)	187,427	69,290	256,716
4	COVID-19 Pandemic (CEMA)	5,234	-	5,234
5	COVID-19 Pandemic Protections Memo Account (CPPMA)	11,266	-	11,266
6	Disconnection Memo Account (DMA)	8,480	-	8,480
7	Emergency Consumer Protections MA (ECPMA)	2,214	-	2,214
8	California Consumer Privacy Act MA (CCPAMA)	5,937	2,844	8,782
9	Microgrids Memorandum Account (MGMA)	87,213	2,170	89,383
10	TRRRMA	(330)	(4,340)	(4,669)
11	Subtotal - Recorded without Interest	1,223,623	69,964	1,293,587
12	<u>Interest (2021-2023)</u>	34,590	324	34,914
13	Total RRQ (including Interest)	1,258,213	70,289	1,328,501

V. RELIEF SOUGHT

A. The Revenue Requirement Sought

In this Application, PG&E respectfully requests authorization to recover a total revenue requirement of \$1.3 billion (excluding interest) corresponding to the costs summarized above.

In a separate motion, filed in connection with this Application, PG&E seeks interim rate relief of 85 percent of the \$1.3 billion total revenue requirement requested, or \$1.1 billion, to be recovered over 12 months beginning June 1, 2023 (Electric Distribution only) and the remaining

15 percent, or \$224.4 million, to be recovered over the subsequent 12 months, with the exception of the capital revenue requirement which would extend through 2026. This is discussed in further detail in PG&E's testimony, Chapter 12, Table 12-5.

If the Commission grants PG&E's revenue requirement proposal in this Application as requested, the typical bundled Non-Care residential electric customer would see their bill increase by approximately \$8.67 per month compared to present bills in the first year, \$1.49 per month compared to present bills in the second year, and \$0.12 per month compared to present bills in the third year. The typical Non-Care residential gas customer would see their bill increase by approximately \$0.08 per month in the second year compared to present bills.

B. Ratemaking Mechanics

We propose to recover all approved expenditures through the Distribution Revenue Adjustment Mechanism (DRAM), Portfolio Allocation Balancing Account (PABA), Core Fixed Cost Account (CFCA), and Noncore Customer Class Charge Account (NCA) rate mechanisms as part of the Annual Electric True-Up (AET) and Annual Gas True-Up (AGT) advice letter filing.

Rates set to recover costs in this Application will be determined in the same manner as rates set to recover other Electric Distribution, Power Generation, Gas Distribution, and Gas Transmission costs, using adopted methodologies for revenue allocation and rate design. The change in rates for approved recovery of recorded costs included in this Application will affect total charges for bundled service customers and for customers who purchase energy from other suppliers (e.g., direct access and community choice aggregation customers).

VI. LEGAL BASIS FOR APPLICATION

PG&E's authority to file this Application arises from a variety of sources. Public Utilities Code Sections 451, 451.1, 454, and 701, and Article 2 of the Commission's Rules of Practice and Procedure provide general authority for PG&E to submit for recovery the costs reflected in this Application.

PG&E has additional authority under:

- Public Utilities Code Section 8386.4(b) to seek recovery of the wildfire mitigation costs;
- Public Utilities Code Section 454.9 to seek recovery of the CEMA costs.

VII. OVERVIEW OF SUPPORTING EVIDENCE

This Application is supported by accompanying testimony and workpapers. The testimony and workpapers are organized as follows:

- Chapter 1 (Introduction and Overview), sponsored by Peter Kenny (Senior Vice President, Vegetation Management and Systems Inspections), provides an introduction and overview of PG&E's supporting testimony for this Application.
- Chapter 2 (WMBA), sponsored by Shawn Holder (Director, Public Safety Power Shutoff) and Scott Strenfel (Director, Meteorology and Fire Science), presents testimony demonstrating the reasonableness WMBA recorded costs for PSPS, AFM, the Storm Outage Prediction Project (SOPP), and the Safety and Infrastructure Protection Teams (SIPT). activities exceeding the WMBA's 115 percent reasonableness review threshold.
- Chapter 3 (Vegetation Management), sponsored by Kamran Rasheed (Senior Manager, Vegetation Management Operations), presents testimony demonstrating the reasonableness of VMBA recorded costs exceeding the VMBA's 120 percent reasonableness review threshold.
- Chapter 4 (Electric Distribution: CEMA), sponsored by Marcus J. Wendler (Electric Program Manager, Principal), presents testimony demonstrating the reasonableness of costs incurred by Electric Operations in response to various CEMA events.
- Chapter 5 (Power Generation: CEMA), sponsored by Aaron R. Cortes (Director, Hydro Operations and Maintenance), presents testimony demonstrating the reasonableness of costs incurred by Power Generation in response to various

CEMA events.

- Chapter 6 (COVID-19 Pandemic: CEMA), sponsored by Angelina M. Gibson (Vice President, Emergency Preparedness and Response), presents testimony demonstrating the reasonableness of costs incurred in response to the COVID-19 Pandemic CEMA event.
- Chapter 7 (Customer Care Accounts, CPPMA, DMA, ECPMA, CCPAMA), sponsored by Lauren Cunningham (Senior Manager, Privacy), Whitnay Peck (Senior Manager, Business Strategy), and La Keisha Stewart (Senior Manager, Electric Program Management), presents testimony demonstrating the reasonableness of costs incurred by the Customer Care organization implementing various customer-related privacy and billing-related protections.
- Chapter 8 (Microgrids), sponsored by sponsored by Joseph Metcalf (Principal, Temporary Generation), presents testimony demonstrating the reasonableness of costs incurred by PG&E in connection with evaluating and implementing microgrids to mitigate the impact of PSPS events on customers.
- Chapter 9 (Transmission Revenue Requirement Reclassification Memorandum Account), sponsored by George Kataoka (Capital Recovery Financial Analyst, Expert), presents testimony explaining revenue requirement adjustments associated with costs for (1) transmission assets included in FERC transmission rates subsequently deemed to be CPUC-jurisdictional; and (2) transmission assets included CPUC electric distribution rates subsequently deemed to be FERC jurisdictional.
- Chapter 10 (Demonstration of Incrementality), sponsored by Todd B. Mintzer (Director, Work & Resource Portfolio), presents testimony explaining that the costs in this Application are incremental to those in PG&E's base rates.
- Chapter 11 (Accounting Adjustments to Recorded Costs), sponsored by Bryan G. Wong (Principal, Revenue Requirements) and Leo Yang (Expert, Revenue

Requirements), describes certain accounting adjustments for the recorded costs included in this Application.

- Chapter 12 (Revenue Requirement), sponsored by Annette G. Quon (Senior Analyst, Revenue Requirements), presents the calculation of the revenue requirement corresponding to the recorded costs (after adjustments) and our cost recovery proposal.

VIII. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Statutory Authority

This Application is made pursuant to Public Utilities Code Sections 451, 451.1, 454, 454.9 and 701 and Article 2 of the Commission's Rules of Practice and Procedure.

B. Categorization, Hearings, and Issues to be Considered (Rules 2.1(c), 7.1)

1. Proposed Category

The purpose of this Application is to request recovery for costs recorded in various balancing and memorandum accounts, including costs recorded in the WMBA for wildfire mitigation activities, VMBA for vegetation management activities, CEMA for PG&E's costs arising from various catastrophic wildfire costs. PG&E proposes that the proceeding be categorized as a ratesetting proceeding.

2. Need for Hearing

We anticipate that hearings will be required in this proceeding.

3. Issues to be Considered

The principal issue presented in this Application is:

- Whether the Commission should grant PG&E's request to recover up to \$1.3 billion in revenue requirement?

C. Proposed Schedule (Rules 2.1(c), 2.9)

Pursuant to Rule 2.9, PG&E requests the following expedited schedule for processing this Application. Attachment B provides PG&E's justification for the requested expedited schedule.

<u>Activity</u>	<u>Proposed Date</u>
Application Filed	December 15, 2022
Protests or Responses	~January 17, 2023
Reply to Protests or Responses	~January 27, 2023
Prehearing Conference	TBD
Intervenor Testimony	May 22, 2023
Rebuttal Testimony	June 23, 2023
Evidentiary Hearings	Week of July 17, 2023
Opening Briefs	August 18, 2023
Reply Briefs	September 1, 2023
Final Decision	Prior to end of 2023

The Commission recently determined in SCE’s GRC that the utility may request an expedited schedule under Rule 2.9 for recorded wildfire mitigation costs exceeding the authorized revenue requirement in SCE’s two-way balancing account for such costs.²² Given that this Application involves the reasonableness review of wildfire mitigation costs exceeding the reasonableness review thresholds in PG&E’s WMBA and VMBA, the proposed expedited schedule above is consistent with this decision. In addition, an expedited schedule also conforms the resolution of this proceeding to the requirements of Public Utilities Code Section 459.9, which “requires the Commission to hold expedited hearings in response to utility applications to recover costs associated with catastrophic events.”²³ Finally, this proposed schedule is consistent with the initial schedules established by the Commission for PG&E’s prior WMCE applications, A.20-09-019 and A.21-09-008.

PG&E welcomes the opportunity to engage in post-filing workshops, settlement discussions, and other measures that would be convenient for the parties in order to promote a faster resolution of this proceeding.

²² D.21-08-036, pp. 249-250.

²³ Public Utilities Code § 454.9(b).

D. Legal Name and Principal Place of Business (Rule 2.1(a))

Applicant's legal name is Pacific Gas and Electric Company. Since October 10, 1905, PG&E has been an operating public utility corporation, organized under California law. PG&E is engaged principally in the business of furnishing electric and gas service in northern and central California. PG&E's mailing address for this matter is Post Office Box 7442, San Francisco, California 94120.

E. Correspondence and Communications Regarding this Application (Rule 2.1(b))

Communications regarding this Application should be addressed to:

Walker A. Matthews
Pacific Gas and Electric Company
Law Department
300 Lakeside Drive
Oakland, CA 94612
Telephone: (925) 750-0041
E-mail: walker.matthews@pge.com

and

Viktoriya Malkina
Case Manager
Pacific Gas and Electric Company
Regulatory Affairs
300 Lakeside Drive
Oakland, CA 94612
Telephone: (415) 973-1818
E-mail: viktoriya.malkina@pge.com

F. Relevant Safety Considerations (Rule 2.1(c))

In D.16-01-017, the Commission amended Rule 2.1(c) requiring an applicant to identify all relevant safety considerations implicated by an application to which the assigned Commissioners and presiding officer could refer during the proceeding. Insofar as this proceeding concerns past expenditures, this proceeding is not expected to have direct impacts on safety.

G. Article of Incorporation (Rule 2.2)

A certified copy of PG&E's Amended and Restated Articles of Incorporation, effective June 22, 2020, was filed with the Commission on July 1, 2020, in A.20-07-002. These Articles are incorporated herein by reference.

H. Balance Sheet and Income Statement (Rule 3.2(a)(1))

Exhibit A of this Application presents PG&E's most recent balance sheet and income statement for the period ending September 30, 2022.

I. Statement of Presently Effective Rates (Rule 3.2(a)(2))

PG&E's presently effective electric rates were filed on June 1, 2022, in A.21-06-021, and are incorporated herein by reference. PG&E's presently effective gas rates were filed on August 1, 2022, in A.22-08-003, and are incorporated herein by reference.

J. Statement of Proposed Rate Increases (Rule 3.2(a)(3))

The proposed changes in electric and gas rates are set forth in Exhibits B and C, respectively.

K. Summary of Earnings (Rules 3.2(a)(5))

A summary of recorded 2021 revenues, expenses, rate bases, and rate of return for PG&E's Electric and Gas Departments was filed with the Commission on July 22, 2022, in A.21-06-021, and is incorporated by reference herein.

L. Most Recent Proxy Statement (Rule 3.2(a)(8))

PG&E's most recent proxy statement, dated April 7, 2022, was filed with the Commission on April 20, 2022, in A.22-04-008, and is incorporated herein by reference.

M. Type of Rate Change Requested (Rule 3.2(a)(10))

The rate change sought in this Application is for recovery of increased costs to provide services as recorded in the balancing and memorandum described above.

N. Service and Notice of Application (Rule 3.2(b-d))

A list of the cities and counties affected by the rate changes resulting from this Application is attached as Exhibit D. The State of California is also a customer of PG&E whose

rates would be affected by the proposed revisions. As provided in Rule 3.2(b), a notice describing in general terms the proposed revenue increases and rate changes will be mailed to the officials identified in Exhibit D within 20 days after the filing of this Application. The notice will state that a copy of this Application and related attachments would be furnished by PG&E upon written request.

Within 20 days after the filing of this Application, PG&E will publish a notice of the proposed increases in rates in a newspaper of general circulation in each county in its service territory. That notice will state that a copy of this Application and related attachments may be examined at the Commission's offices and such offices of PG&E as specified in the notice. A similar notice will be included in the regular bills mailed to PG&E's customers within 45 days of today's filing date.

PG&E is contemporaneously serving this Application, as well as a notice of availability for the accompanying testimony and workpapers, on the service list established for PG&E's 2023 GRC Application (A.21-06-021).

O. Affordability

Decision (D.) 22-08-023 in Rulemaking (R.) 18-07-006 (Affordability Order Instituting Rulemaking (OIR) proceeding) requires PG&E to include specific affordability metrics and analysis for any initial filing in any proceeding with a revenue increase estimated to exceed one percent of currently authorized revenues systemwide for a single year. The cost-recovery request made in this Application meets this reporting criteria. In accordance with D.22-08-023 Ordering Paragraphs 5 and 6, PG&E provides the required affordability metrics and analysis in Exhibit E of this Application.

P. Exhibit List and Statement of Readiness

Attached to this Application are the following exhibits:

- Exhibit A: Balance Sheet and Income Statement
- Exhibit B: Proposed Changes in Electric Rates
- Exhibit C: Proposed Changes in Gas Rates

Exhibit D: Affected Governmental Entities/List of Cities and Counties

Exhibit E: Electric Affordability Metric Impacts Per Decision (D.) 22-08-023

PG&E is prepared to proceed with this case based on the facts and data contained in the accompanying testimony and workpapers supporting this Application.

IX. CONCLUSION

WHEREFORE, PG&E respectfully requests that the Commission issue a final decision:

1. Approving PG&E's request to recover up to \$1.3 billion (excluding interest) in revenue requirement;
2. Granting such other and further relief as the Commission deems appropriate.

Respectfully Submitted,

By: /s/ Walker A. Matthews
WALKER A. MATTHEWS

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 9410
Telephone: (925) 750-0041
Facsimile: (415) 973-5520
E-Mail: walker.matthews@pge.com

Dated: December 15, 2022

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT A

VERIFICATION

I, undersigned, say:

I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification for that reason.

I have read the foregoing "*Application of Pacific Gas and Electric Company (U 39 M) for Recovery of Recorded Expenditures Related to Wildfire Mitigation, Catastrophic Events, and Other Recorded Costs*" and I am informed and believe the matters therein are true and on that ground I allege that the matters stated therein are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Oakland, California this 15th day of December 2022.

/s/ Peter Kenny

PETER KENNY

Senior Vice President, Vegetation Management &
System Inspections

ATTACHMENT B

REQUEST FOR EXPEDITED SCHEDULE

PG&E respectfully requests that this *Application of Pacific Gas and Electric Company for Recovery of Recorded Expenditures Related to Wildfire Mitigation, Catastrophic Events, and Other Recorded Costs* be considered by the Commission on an expedited basis to avoid ratepayer harm. The Commission recently determined in Southern California Edison Company's (SCE) 2021 GRC that the utility may request an expedited schedule under Rule 2.9 for recorded wildfire mitigation costs exceeding the authorized revenue requirement in SCE's two-way balancing account for such costs.²⁴ Given that PG&E's Application involves the reasonableness review of wildfire mitigation costs exceeding the reasonableness review thresholds in PG&E's WMBA and VMBA, the requested expedited schedule above is consistent with this decision. In addition, an expedited schedule also conforms the resolution of this proceeding to the requirements of Public Utilities Code Section 459.9, which "requires the Commission to hold expedited hearings in response to utility applications to recover costs associated with catastrophic events."²⁵ Further, an expedited review of the costs included in this Application will provide customer benefits by ensuring regulatory certainty within a specific, shorter time frame as opposed to a more drawn out review process. These benefits include greater transparency and more timely decision regarding customer rates.

²⁴ D.21-08-036, pp. 249-250.

²⁵ Public Utilities Code § 454.9(b).

EXHIBIT A

PACIFIC GAS AND ELECTRIC COMPANY
CONDENSED CONSOLIDATED STATEMENTS OF INCOME
(in millions)

	(Unaudited)			
	Three Months Ended September 30,		Nine Months Ended September 30,	
	2022	2021	2022	2021
Operating Revenues				
Electric	\$ 3,895	\$ 4,181	\$ 11,743	\$ 11,527
Natural gas	1,499	1,284	4,567	3,869
Total operating revenues	5,394	5,465	16,310	15,396
Operating Expenses				
Cost of electricity	1,032	1,133	2,314	2,570
Cost of natural gas	257	176	1,177	670
Operating and maintenance	2,248	2,793	7,565	7,705
SB 901 securitization charges, net	—	—	40	—
Wildfire-related claims, net of recoveries	9	94	153	261
Wildfire Fund expense	118	162	353	399
Depreciation, amortization, and decommissioning	1,002	801	2,915	2,540
Total operating expenses	4,666	5,159	14,517	14,145
Operating Income	728	306	1,793	1,251
Interest income	42	—	71	17
Interest expense	(458)	(342)	(1,175)	(1,032)
Other income, net	127	133	415	390
Reorganization items, net	—	—	—	(12)
Income Before Income Taxes	439	97	1,104	614
Income tax provision (benefit)	(51)	1,139	(516)	1,039
Net Income (Loss)	490	(1,042)	1,620	(425)
Preferred stock dividend requirement	3	3	10	10
Income (Loss) Attributable to Common Stock	\$ 487	\$ (1,045)	\$ 1,610	\$ (435)

See accompanying Notes to the Condensed Consolidated Financial Statements.

PACIFIC GAS AND ELECTRIC COMPANY
CONDENSED CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME

(in millions)	(Unaudited)			
	Three Months Ended September 30,		Nine Months Ended September 30,	
	2022	2021	2022	2021
Net Income (Loss)	\$ 490	\$ (1,042)	\$ 1,620	\$ (425)
Other Comprehensive Income				
Pension and other post-retirement benefit plans obligations (net of taxes of \$0, \$0, \$0, and \$0, respectively)	—	—	1	—
Net unrealized losses on available-for-sale securities (net of taxes of \$5, \$0, \$7, and \$0, respectively)	(12)	—	(17)	—
Total other comprehensive loss	(12)	—	(16)	—
Comprehensive Income (Loss)	\$ 478	\$ (1,042)	\$ 1,604	\$ (425)

See accompanying Notes to the Condensed Consolidated Financial Statements.

PACIFIC GAS AND ELECTRIC COMPANY
CONDENSED CONSOLIDATED BALANCE SHEETS
(in millions)

	(Unaudited)	
	Balance At	
	September 30, 2022	December 31, 2021
ASSETS		
Current Assets		
Cash and cash equivalents	\$ 107	\$ 165
Restricted cash (includes \$134 million and \$4 million related to VIEs at respective dates)	145	16
Accounts receivable		
Customers (net of allowance for doubtful accounts of \$192 million and \$171 million at respective dates) (includes \$2.29 billion and \$2.06 billion related to VIEs, net of allowance for doubtful accounts of \$192 million and \$171 million at respective dates)	2,726	2,345
Accrued unbilled revenue (includes \$992 million and \$1.09 billion related to VIEs at respective dates)	1,150	1,207
Regulatory balancing accounts	3,037	2,999
Other	1,991	1,932
Regulatory assets	317	496
Inventories		
Gas stored underground and fuel oil	82	44
Materials and supplies	666	552
Wildfire Fund asset	461	461
Other	1,091	869
Total current assets	11,773	11,086
Property, Plant, and Equipment		
Electric	73,647	69,482
Gas	27,725	25,979
Construction work in progress	4,122	3,480
Financing lease	18	18
Total property, plant, and equipment	105,512	98,959
Accumulated depreciation	(30,438)	(29,131)
Net property, plant, and equipment	75,074	69,828
Other Noncurrent Assets		
Regulatory assets	16,448	9,207
Customer credit trust	874	—
Nuclear decommissioning trusts	3,149	3,798
Operating lease right of use asset	1,199	1,232
Wildfire Fund asset	4,967	5,313
Income taxes receivable	7	7
Other (includes noncurrent accounts receivable of \$36 million and \$187 million related to VIEs, net of noncurrent allowance for doubtful accounts of \$3 million and \$15 million at respective dates)	2,948	2,706
Total other noncurrent assets	29,592	22,263
TOTAL ASSETS	\$ 116,439	\$ 103,177

See accompanying Notes to the Condensed Consolidated Financial Statements.

PACIFIC GAS AND ELECTRIC COMPANY
CONDENSED CONSOLIDATED BALANCE SHEETS
(in millions, except share amounts)

	(Unaudited)	
	Balance At	
	September 30, 2022	December 31, 2021
LIABILITIES AND SHAREHOLDERS' EQUITY		
Current Liabilities		
Short-term borrowings	\$ 1,795	\$ 2,184
Long-term debt, classified as current (includes \$128 million and \$18 million related to VIEs at respective dates)	1,003	4,455
Accounts payable		
Trade creditors	2,962	2,853
Regulatory balancing accounts	1,718	1,121
Other	590	648
Operating lease liabilities	327	467
Interest payable (includes \$107 million and \$3 million related to VIEs at respective dates)	413	430
Wildfire-related claims	2,194	2,722
Other	2,506	2,430
Total current liabilities	13,508	17,310
Noncurrent Liabilities		
Long-term debt (includes \$9.54 billion and \$1.82 billion related to VIEs at respective dates)	43,265	33,632
Regulatory liabilities	16,921	11,999
Pension and other postretirement benefits	575	764
Asset retirement obligations	6,223	5,298
Deferred income taxes	3,568	3,409
Operating lease liabilities	996	810
Other	4,660	4,345
Total noncurrent liabilities	76,208	60,257
Shareholders' Equity		
Preferred stock	258	258
Common stock, \$5 par value, authorized 800,000,000 shares; 264,374,809 shares outstanding at respective dates	1,322	1,322
Additional paid-in capital	28,713	28,286
Reinvested earnings	(3,545)	(4,247)
Accumulated other comprehensive loss	(25)	(9)
Total shareholders' equity	26,723	25,610
TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY	\$ 116,439	\$ 103,177

See accompanying Notes to the Condensed Consolidated Financial Statements.

EXHIBIT B

Table 1
Pacific Gas and Electric Company
Illustrative Electric Revenue Increase and Class Average Rates
Year 1: June 2023 - May 2024

Line No.	Customer Class	Proposed Revenue Increase (000's)	Present Rates (\$/kWh)	Proposed Rates (\$/kWh)	Percentage Change	Line No.
Bundled Service*						
1	Residential	\$ 176,455	\$ 0.29321	\$ 0.30830	5.1%	1
2	Small Commercial	\$ 41,567	\$ 0.32216	\$ 0.34006	5.6%	2
3	Medium Commercial	\$ 36,029	\$ 0.30162	\$ 0.31778	5.4%	3
4	Large Commercial	\$ 42,917	\$ 0.26045	\$ 0.27456	5.4%	4
5	Streetlights	\$ 1,204	\$ 0.36682	\$ 0.38366	4.6%	5
6	Standby	\$ 1,651	\$ 0.19370	\$ 0.19987	3.2%	6
7	Agriculture	\$ 75,974	\$ 0.29404	\$ 0.31075	5.7%	7
8	Industrial	\$ 39,621	\$ 0.20604	\$ 0.21648	5.1%	8
9	Total	\$ 415,418	\$ 0.28027	\$ 0.29512	5.3%	9
Direct Access and Community Choice Aggregation Service**						
10	Residential	\$ 268,561	\$ 0.18676	\$ 0.20328	8.9%	10
11	Small Commercial	\$ 92,847	\$ 0.19421	\$ 0.21210	9.2%	11
12	Medium Commercial	\$ 82,208	\$ 0.15940	\$ 0.17489	9.7%	12
13	Large Commercial	\$ 131,347	\$ 0.12228	\$ 0.13523	10.6%	13
14	Streetlights	\$ 2,417	\$ 0.19203	\$ 0.20736	8.0%	14
15	Standby	\$ 1,822	\$ 0.18912	\$ 0.22992	21.6%	15
16	Agriculture	\$ 20,955	\$ 0.15929	\$ 0.17378	9.1%	16
17	Industrial	\$ 100,333	\$ 0.08095	\$ 0.09069	12.0%	17
18	Total	\$ 700,490	\$ 0.14807	\$ 0.16241	9.7%	18
Departing Load***						
19	Residential	\$ 1			0.2%	19
20	Small Commercial	\$ 6			2.0%	20
21	Medium Commercial	\$ 36			2.3%	21
22	Large Commercial	\$ 62			3.1%	22
23	Streetlights	\$ -			0.0%	23
24	Standby	\$ -			0.0%	24
25	Agriculture	\$ 15			3.1%	25
26	Industrial	\$ 833			2.8%	26

* Customers who receive electric generation as well as transmission and distribution service from PG&E.

** Customers who purchase energy from non-PG&E suppliers.

*** Customers who purchase their electricity from a non-utility supplier and receive transmission and distribution service from a publicly owned utility or municipality. A rate comparison cannot be provided for Departed Load as the applicable rates vary by specific departed load customer categories and any average rate that could be derived, would not be representative of any particular departed load category.

Table 2
Pacific Gas and Electric Company
Illustrative Electric Revenue Increase and Class Average Rates
Year 2: June 2024 - May 2025

Line No.	Customer Class	Proposed Revenue Increase (000's)	Present Rates (\$/kWh)	Proposed Rates (\$/kWh)	Percentage Change	Line No.
Bundled Service*						
1	Residential	\$ 28,960	\$ 0.29321	\$ 0.29569	0.8%	1
2	Small Commercial	\$ 7,536	\$ 0.32216	\$ 0.32540	1.0%	2
3	Medium Commercial	\$ 7,416	\$ 0.30162	\$ 0.30495	1.1%	3
4	Large Commercial	\$ 8,172	\$ 0.26045	\$ 0.26314	1.0%	4
5	Streetlights	\$ 219	\$ 0.36682	\$ 0.36988	0.8%	5
6	Standby	\$ 278	\$ 0.19370	\$ 0.19474	0.5%	6
7	Agriculture	\$ 12,517	\$ 0.29404	\$ 0.29680	0.9%	7
8	Industrial	\$ 7,187	\$ 0.20604	\$ 0.20793	0.9%	8
9	Total	\$ 72,284	\$ 0.28027	\$ 0.28285	0.9%	9
Direct Access and Community Choice Aggregation Service**						
10	Residential	\$ 44,715	\$ 0.18676	\$ 0.18951	1.5%	10
11	Small Commercial	\$ 16,611	\$ 0.19421	\$ 0.19741	1.6%	11
12	Medium Commercial	\$ 16,223	\$ 0.15940	\$ 0.16246	1.9%	12
13	Large Commercial	\$ 24,140	\$ 0.12228	\$ 0.12466	1.9%	13
14	Streetlights	\$ 270	\$ 0.19203	\$ 0.19374	0.9%	14
15	Standby	\$ 312	\$ 0.18912	\$ 0.19611	3.7%	15
16	Agriculture	\$ 3,479	\$ 0.15929	\$ 0.16169	1.5%	16
17	Industrial	\$ 17,721	\$ 0.08095	\$ 0.08267	2.1%	17
18	Total	\$ 123,471	\$ 0.14807	\$ 0.15060	1.7%	18
Departing Load***						
19	Residential	\$ 0			0.0%	19
20	Small Commercial	\$ 1			0.3%	20
21	Medium Commercial	\$ 6			0.4%	21
22	Large Commercial	\$ 10			0.5%	22
23	Streetlights	\$ -			0.0%	23
24	Standby	\$ -			0.0%	24
25	Agriculture	\$ 2			0.5%	25
26	Industrial	\$ 137			0.5%	26

* Customers who receive electric generation as well as transmission and distribution service from PG&E.

** Customers who purchase energy from non-PG&E suppliers.

*** Customers who purchase their electricity from a non-utility supplier and receive transmission and distribution service from a publicly owned utility or municipality. A rate comparison cannot be provided for Departed Load as the applicable rates vary by specific departed load customer categories and any average rate that could be derived, would not be representative of any particular departed load category.

Table 3
Pacific Gas and Electric Company
Illustrative Electric Revenue Increase and Class Average Rates
Year 3: June 2025 - December 2026

Line No.	Customer Class	Proposed Revenue Increase (000's)	Present Rates (\$/kWh)	Proposed Rates (\$/kWh)	Percentage Change	Line No.
Bundled Service*						
1	Residential	\$ 2,320	\$ 0.29321	\$ 0.29341	0.1%	1
2	Small Commercial	\$ 554	\$ 0.32216	\$ 0.32240	0.1%	2
3	Medium Commercial	\$ 479	\$ 0.30162	\$ 0.30184	0.1%	3
4	Large Commercial	\$ 570	\$ 0.26045	\$ 0.26064	0.1%	4
5	Streetlights	\$ 84	\$ 0.36682	\$ 0.36800	0.3%	5
6	Standby	\$ 23	\$ 0.19370	\$ 0.19379	0.0%	6
7	Agriculture	\$ 1,011	\$ 0.29404	\$ 0.29427	0.1%	7
8	Industrial	\$ 527	\$ 0.20604	\$ 0.20618	0.1%	8
9	Total	\$ 5,568	\$ 0.28027	\$ 0.28046	0.1%	9
Direct Access and Community Choice Aggregation Service**						
10	Residential	\$ 3,590	\$ 0.18676	\$ 0.18698	0.1%	10
11	Small Commercial	\$ 1,235	\$ 0.19421	\$ 0.19444	0.1%	11
12	Medium Commercial	\$ 1,091	\$ 0.15940	\$ 0.15961	0.1%	12
13	Large Commercial	\$ 1,742	\$ 0.12228	\$ 0.12245	0.1%	13
14	Streetlights	\$ 22	\$ 0.19203	\$ 0.19217	0.1%	14
15	Standby	\$ 25	\$ 0.18912	\$ 0.18968	0.3%	15
16	Agriculture	\$ 278	\$ 0.15929	\$ 0.15948	0.1%	16
17	Industrial	\$ 1,331	\$ 0.08095	\$ 0.08108	0.2%	17
18	Total	\$ 9,241	\$ 0.14807	\$ 0.14826	0.1%	18
Departing Load***						
19	Residential	\$ 0			0.0%	19
20	Small Commercial	\$ 0			0.0%	20
21	Medium Commercial	\$ 1			0.0%	21
22	Large Commercial	\$ 1			0.0%	22
23	Streetlights	\$ -			0.0%	23
24	Standby	\$ -			0.0%	24
25	Agriculture	\$ 0			0.0%	25
26	Industrial	\$ 12			0.0%	26

* Customers who receive electric generation as well as transmission and distribution service from PG&E.

** Customers who purchase energy from non-PG&E suppliers.

*** Customers who purchase their electricity from a non-utility supplier and receive transmission and distribution service from a publicly owned utility or municipality. A rate comparison cannot be provided for Departed Load as the applicable rates vary by specific departed load customer categories and any average rate that could be derived, would not be representative of any particular departed load category.

EXHIBIT C

Class Average Bundled and Transportation/PPPS Rates (\$/th)

Line No.	Customer Class	<u>Present</u>	<u>Proposed</u>	<u>\$ Change</u>	<u>% Change</u>
		August 1, 2022	Wildfire Mitigation Catastrophic Events (WMCE) Application		
1	BUNDLED—RETAIL CORE*				
2	Residential Non-CARE	\$2.134	\$2.137	\$0.002	0.1%
3	Small Commercial Non-CARE	\$1.562	\$1.565	\$0.002	0.2%
4	Large Commercial	\$1.158	\$1.160	\$0.002	0.2%
5	Uncompressed Core NGV	\$1.139	\$1.141	\$0.002	0.2%
6	Compressed Core NGV	\$2.717	\$2.720	\$0.002	0.1%
7	TRANSPORT ONLY—RETAIL CORE				
8	Residential Non-CARE	\$1.632	\$1.634	\$0.002	0.2%
9	Small Commercial Non-CARE	\$1.084	\$1.086	\$0.002	0.2%
10	Large Commercial	\$0.722	\$0.725	\$0.002	0.3%
11	Uncompressed Core NGV	\$0.708	\$0.711	\$0.002	0.4%
12	Compressed Core NGV	\$2.287	\$2.290	\$0.002	0.1%
13	TRANSPORT ONLY—RETAIL NONCORE (NONCOVERED ENTITIES)				
14	Industrial – Distribution	\$0.600	\$0.603	\$0.002	0.4%
15	Industrial – Transmission	\$0.328	\$0.331	\$0.002	0.8%
16	Industrial – Backbone	\$0.194	\$0.196	\$0.002	1.3%
17	Uncompressed Noncore NGV – Distribution	\$0.581	\$0.584	\$0.002	0.4%
18	Uncompressed Noncore NGV – Transmission	\$0.312	\$0.315	\$0.002	0.8%
19	Electric Generation – Distribution/Transmission	\$0.263	\$0.265	\$0.002	0.9%
20	Electric Generation – Backbone	\$0.138	\$0.140	\$0.002	1.8%
21	TRANSPORT ONLY—RETAIL NONCORE (COVERED ENTITIES)				
22	Industrial – Distribution	\$0.498	\$0.500	\$0.002	0.5%
23	Industrial – Transmission	\$0.226	\$0.228	\$0.002	1.1%
24	Industrial – Backbone	\$0.091	\$0.094	\$0.002	2.7%
25	Uncompressed Noncore NGV – Distribution	\$0.479	\$0.481	\$0.002	0.5%
26	Uncompressed Noncore NGV – Transmission	\$0.210	\$0.212	\$0.002	1.2%
27	Electric Generation – Distribution/Transmission	\$0.161	\$0.163	\$0.002	1.5%
28	Electric Generation – Backbone	\$0.036	\$0.038	\$0.002	7.0%
29	TRANSPORT ONLY—WHOLESALE				
30	Alpine Natural Gas (T)	\$0.159	\$0.162	\$0.002	1.6%
31	Coalinga (T)	\$0.160	\$0.162	\$0.002	1.6%
32	Island Energy (T)	\$0.168	\$0.171	\$0.002	1.5%
33	Palo Alto (T)	\$0.157	\$0.159	\$0.002	1.6%
34	West Coast Gas – Castle (D)	\$0.478	\$0.480	\$0.002	0.5%
35	West Coast Gas – Mather (D)	\$0.701	\$0.703	\$0.002	0.4%
36	West Coast Gas – Mather (T)	\$0.161	\$0.163	\$0.002	1.5%

* Illustrative Bundled Rates incorporate an illustrative procurement revenue requirement as filed in PG&E's 2022 AGT.

- (1) CARE Customers receive a 20% discount off of PG&E's total bundled rate and are exempt from the CARE portion of PG&E's Public Purpose Program Surcharge (G-PPPS) rates and cost recovery of the California Solar Initiative Thermal Program.
- (2) Transportation rates paid by all customers include an additional GHG Compliance and obligation Cost Recovery component of \$0.10446 per therm.
- (3) Covered Entities (i.e. customers that currently have a direct obligation to pay for allowances directly to the Air Resources Board) will pay a GHG Compliance Recovery Cost component of \$0.00211 per therm to cover PG&E allowance costs associated with lost & unaccounted for (LUAF) gas and compression costs. Covered entities will see a line item credit on their bill equal to \$0.10235 (\$0.10446 minus \$0.00211) per therm times their monthly billed volumes.

EXECUTIVE SUMMARY
PACIFIC GAS AND ELECTRIC COMPANY
PROPOSED WILDFIRE MITIGATION CATASTROPHIC EVENT REVENUE REQUIREMENT OF \$16.5 Million

Class Average Illustrative Revenues Allocated By Customer
Class (\$000)

Line No.	Customer Class	Wildfire Mitigation Catastrophic Events			
		August 1, 2022	(WMCE) Application	\$ Change	% Change
1	BUNDLED—RETAIL CORE (1)				
2	Residential Non-CARE	\$2,360,984	\$2,364,046	\$3,061	0.1%
3	Residential CARE (1)	\$751,634	\$752,608	\$975	0.1%
4	Small Commercial	\$728,058	\$729,171	\$1,113	0.2%
5	Large Commercial	\$44,349	\$44,440	\$91	0.2%
6	Core NGV	\$44,326	\$44,408	\$82	0.2%
7	TRANSPORT ONLY—RETAIL CORE				
8	Residential Non-CARE	\$190,358	\$190,726	\$368	0.2%
9	Residential CARE (1)	\$60,514	\$60,631	\$117	0.2%
10	Small Commercial Non-CARE	\$338,137	\$338,960	\$823	0.2%
11	Large Commercial	\$20,990	\$21,069	\$79	0.4%
12	Core NGV	\$0	\$0	\$0	0.0%
13	TRANSPORT ONLY—RETAIL NONCORE				
14	Industrial – Distribution	\$150,678	\$151,319	\$641	0.4%
15	Industrial – Transmission	\$431,516	\$435,962	\$4,445	1.0%
16	Industrial – Backbone	\$1,876	\$1,921	\$45	2.4%
17	Uncompressed Noncore NGV	\$2,587	\$2,607	\$21	0.8%
18	Electric Generation	\$161,658	\$166,167	\$4,509	2.8%
19	TRANSPORT ONLY—WHOLESALE				
20	Alpine Natural Gas	\$84	\$85	\$1	1.6%
21	Coalinga	\$337	\$342	\$5	1.6%
22	Island Energy	\$74	\$75	\$1	1.5%
23	Palo Alto	\$4,709	\$4,784	\$75	1.6%
24	West Coast Gas – Castle	\$297	\$299	\$2	0.5%
25	West Coast Gas – Mather	\$449	\$451	\$2	0.5%
26	Unbundled Gas Transmission & Storage (2)	\$342,451	\$342,451	\$0	0.0%
		5,636,065	5,652,522	\$16,457	0.3%

- (1) CARE Customers receive a 20% discount off of PG&E's total bundled rate and are exempt from the CARE portion of PG&E's Public Purpose Program Surcharge (G-PPPS) rates and cost recovery of the California Solar Initiative Thermal Program.
- (2) The portion of PG&E's gas backbone storage revenue requirement not allocated to PG&E's bundled core customer classes are provided to the marketplace and not specifically to any customer class.

EXHIBIT D

SERVICE OF NOTICE OF APPLICATION

In accordance with Rule 3.2(b), Applicant will mail a notice to the following, stating in general terms its proposed change in rates.

State of California

To the Attorney General and the Department of General Services.

State of California
Office of Attorney General
1300 I St Ste 1101
Sacramento, CA 95814

and

Department of General Services
Office of Buildings & Grounds
505 Van Ness Avenue, Room 2012
San Francisco, CA 94102

Counties

To the County Counsel or District Attorney and the County Clerk in the following counties:

Alameda	Mariposa	Santa Clara
Alpine	Mendocino	Santa Cruz
Amador	Merced	Shasta
Butte	Modoc	Sierra
Calaveras	Monterey	Siskiyou
Colusa	Napa	Solano
Contra Costa	Nevada	Sonoma
El Dorado	Placer	Stanislaus
Fresno	Plumas	Sutter
Glenn	Sacramento	Tehama
Humboldt	San Benito	Trinity
Kern	San Bernardino	Tulare
Kings	San Francisco	Tuolumne
Lake	San Joaquin	Yolo
Lassen	San Luis Obispo	Yuba
Madera	San Mateo	
Marin	Santa Barbara	

Municipal Corporations

To the City Attorney and the City Clerk of the following municipal corporations:

Alameda	Colusa	Hanford
Albany	Concord	Hayward
Amador City	Corcoran	Healdsburg
American Canyon	Corning	Hercules
Anderson	Corte Madera	Hillsborough
Angels Camp	Cotati	Hollister
Antioch	Cupertino	Hughson
Arcata	Daly City	Huron
Arroyo Grande	Danville	Ione
Arvin	Davis	Isleton
Atascadero	Del Rey Oaks	Jackson
Atherton	Dinuba	Kerman
Atwater	Dixon	King City
Auburn	Dos Palos	Kingsburg
Avenal	Dublin	Lafayette
Bakersfield	East Palo Alto	Lakeport
Barstow	El Cerrito	Larkspur
Belmont	Elk Grove	Lathrop
Belvedere	Emeryville	Lemoore
Benicia	Escalon	Lincoln
Berkeley	Eureka	Live Oak
Biggs	Fairfax	Livermore
Blue Lake	Fairfield	Livingston
Brentwood	Ferndale	Lodi
Brisbane	Firebaugh	Lompoc
Buellton	Folsom	Loomis
Burlingame	Fort Bragg	Los Altos
Calistoga	Fortuna	Los Altos Hills
Campbell	Foster City	Los Banos
Capitola	Fowler	Los Gatos
Carmel	Fremont	Madera
Ceres	Fresno	Manteca
Chico	Galt	Maricopa
Chowchilla	Gilroy	Marina
Citrus Heights	Gonzales	Mariposa
Clayton	Grass Valley	Martinez
Clearlake	Greenfield	Marysville
Cloverdale	Gridley	McFarland
Clovis	Grover Beach	Mendota
Coalinga	Guadalupe	Menlo Park
Colfax	Gustine	Merced
Colma	Half Moon Bay	Mill Valley

Millbrae
Milpitas
Modesto
Monte Sereno
Monterey
Moraga
Morgan Hill
Morro Bay
Mountain View
Napa
Newark
Nevada City
Newman
Novato
Oakdale
Oakland
Oakley
Orange Cove
Orinda
Orland
Oroville
Pacific Grove
Pacifica
Palo Alto
Paradise
Parlier
Paso Robles
Patterson
Petaluma
Piedmont
Pinole
Pismo Beach
Pittsburg
Placerville
Pleasant Hill
Pleasanton
Plymouth
Point Arena
Portola
Portola Valley
Rancho Cordova
Red Bluff
Redding
Redwood City
Reedley
Richmond

Ridgecrest
Rio Dell
Rio Vista
Ripon
Riverbank
Rocklin
Rohnert Park
Roseville
Ross
Sacramento
Saint Helena
Salinas
San Anselmo
San Bruno
San Carlos
San Francisco
San Joaquin
San Jose
San Juan Bautista
San Leandro
San Luis Obispo
San Mateo
San Pablo
San Rafael
San Ramon
Sand City
Sanger
Santa Clara
Santa Cruz
Santa Maria
Santa Rosa
Saratoga
Sausalito
Scotts Valley
Seaside
Sebastopol
Selma
Shafter
Shasta Lake
Soledad
Solvang
Sonoma
Sonora
South San Francisco
Stockton
Suisun City

Sunnyvale
Sutter Creek
Taft
Tehama
Tiburon
Tracy
Trinidad
Turlock
Ukiah
Union City
Vacaville
Vallejo
Victorville
Walnut Creek
Wasco
Waterford
Watsonville
West Sacramento
Wheatland
Williams
Willits
Willows
Windsor
Winters
Woodland
Woodside
Yountville
Yuba City

EXHIBIT E

**Electric Affordability Metric Impacts
per Decision (D.) 22-08-023**

CARE Monthly Electric Essential Use Bills										
Climate Zone	Present	Year 1 (June 2023 - May 2024)			Year 2 (June 2024 - May 2025)			Year 3 (June 2025 - Dec 2026)		
	Bill (\$)	Bill (\$)	Change from Present (\$)	%	Bill (\$)	Change from Present (\$)	%	Bill (\$)	Change from Present (\$)	%
Territory P	\$ 73.80	\$ 77.52	\$ 3.72	5.0%	\$ 74.41	\$ 0.61	0.8%	\$ 73.85	\$ 0.05	0.1%
Territory Q	\$ 66.10	\$ 69.44	\$ 3.33	5.0%	\$ 66.65	\$ 0.55	0.8%	\$ 66.15	\$ 0.05	0.1%
Territory R	\$ 80.03	\$ 84.07	\$ 4.04	5.0%	\$ 80.70	\$ 0.67	0.8%	\$ 80.09	\$ 0.06	0.1%
Territory S	\$ 73.59	\$ 77.30	\$ 3.71	5.0%	\$ 74.20	\$ 0.61	0.8%	\$ 73.64	\$ 0.05	0.1%
Territory T	\$ 44.69	\$ 46.95	\$ 2.25	5.0%	\$ 45.06	\$ 0.37	0.8%	\$ 44.72	\$ 0.03	0.1%
Territory V	\$ 48.43	\$ 50.88	\$ 2.44	5.0%	\$ 48.84	\$ 0.40	0.8%	\$ 48.47	\$ 0.03	0.1%
Territory W	\$ 80.66	\$ 84.72	\$ 4.07	5.0%	\$ 81.33	\$ 0.67	0.8%	\$ 80.71	\$ 0.06	0.1%
Territory X	\$ 60.70	\$ 63.76	\$ 3.06	5.0%	\$ 61.20	\$ 0.51	0.8%	\$ 60.74	\$ 0.04	0.1%
Territory Y	\$ 67.97	\$ 71.40	\$ 3.43	5.0%	\$ 68.54	\$ 0.57	0.8%	\$ 68.02	\$ 0.05	0.1%
Territory Z	\$ 44.69	\$ 46.95	\$ 2.25	5.0%	\$ 45.06	\$ 0.37	0.8%	\$ 44.72	\$ 0.03	0.1%

Non-CARE Monthly Electric Essential Use Bills										
Climate Zone	Present	Year 1 (June 2023 - May 2024)			Year 2 (June 2024 - May 2025)			Year 3 (June 2025 - Dec 2026)		
	Bill (\$)	Bill (\$)	Change from Present (\$)	%	Bill (\$)	Change from Present (\$)	%	Bill (\$)	Change from Present (\$)	%
Territory P	\$ 113.44	\$ 119.16	\$ 5.73	5.0%	\$ 114.38	\$ 0.94	0.8%	\$ 113.52	\$ 0.08	0.1%
Territory Q	\$ 101.61	\$ 106.74	\$ 5.13	5.0%	\$ 102.46	\$ 0.85	0.8%	\$ 101.69	\$ 0.07	0.1%
Territory R	\$ 123.02	\$ 129.23	\$ 6.21	5.0%	\$ 124.05	\$ 1.02	0.8%	\$ 123.11	\$ 0.09	0.1%
Territory S	\$ 113.12	\$ 118.83	\$ 5.71	5.0%	\$ 114.06	\$ 0.94	0.8%	\$ 113.20	\$ 0.08	0.1%
Territory T	\$ 68.70	\$ 72.17	\$ 3.47	5.0%	\$ 69.27	\$ 0.57	0.8%	\$ 68.75	\$ 0.05	0.1%
Territory V	\$ 74.45	\$ 78.21	\$ 3.76	5.0%	\$ 75.07	\$ 0.62	0.8%	\$ 74.51	\$ 0.05	0.1%
Territory W	\$ 123.98	\$ 130.24	\$ 6.26	5.0%	\$ 125.02	\$ 1.03	0.8%	\$ 124.07	\$ 0.09	0.1%
Territory X	\$ 93.31	\$ 98.02	\$ 4.71	5.0%	\$ 94.08	\$ 0.78	0.8%	\$ 93.37	\$ 0.07	0.1%
Territory Y	\$ 104.49	\$ 109.77	\$ 5.27	5.0%	\$ 105.36	\$ 0.87	0.8%	\$ 104.56	\$ 0.07	0.1%
Territory Z	\$ 68.70	\$ 72.17	\$ 3.47	5.0%	\$ 69.27	\$ 0.57	0.8%	\$ 68.75	\$ 0.05	0.1%

*Essential Use Bills are for customers with basic end-use. Bills do not include the biannual California Climate Credit.

CARE Monthly Electric Average Use Bills										
Climate Zone	Present	Year 1 (June 2023 - May 2024)			Year 2 (June 2024 - May 2025)			Year 3 (June 2025 - Dec 2026)		
	Bill (\$)	Bill (\$)	Change from Present (\$)	%	Bill (\$)	Change from Present (\$)	%	Bill (\$)	Change from Present (\$)	%
Territory P	\$ 132.34	\$ 138.94	\$ 6.59	5.0%	\$ 133.43	\$ 1.08	0.8%	\$ 132.43	\$ 0.09	0.1%
Territory Q	\$ 109.72	\$ 115.20	\$ 5.47	5.0%	\$ 110.62	\$ 0.90	0.8%	\$ 109.79	\$ 0.07	0.1%
Territory R	\$ 129.14	\$ 135.59	\$ 6.44	5.0%	\$ 130.20	\$ 1.06	0.8%	\$ 129.23	\$ 0.08	0.1%
Territory S	\$ 122.47	\$ 128.58	\$ 6.11	5.0%	\$ 123.47	\$ 1.00	0.8%	\$ 122.55	\$ 0.08	0.1%
Territory T	\$ 76.96	\$ 80.79	\$ 3.84	5.0%	\$ 77.59	\$ 0.63	0.8%	\$ 77.01	\$ 0.05	0.1%
Territory V	\$ 87.74	\$ 92.11	\$ 4.37	5.0%	\$ 88.46	\$ 0.72	0.8%	\$ 87.79	\$ 0.06	0.1%
Territory W	\$ 126.68	\$ 133.00	\$ 6.32	5.0%	\$ 127.71	\$ 1.04	0.8%	\$ 126.76	\$ 0.08	0.1%
Territory X	\$ 97.65	\$ 102.52	\$ 4.87	5.0%	\$ 98.45	\$ 0.80	0.8%	\$ 97.71	\$ 0.06	0.1%
Territory Y	\$ 121.92	\$ 127.99	\$ 6.07	5.0%	\$ 122.91	\$ 1.00	0.8%	\$ 122.00	\$ 0.08	0.1%
Territory Z	\$ 88.85	\$ 93.27	\$ 4.42	5.0%	\$ 89.58	\$ 0.73	0.8%	\$ 88.91	\$ 0.06	0.1%

Non-CARE Monthly Electric Average Use Bills										
Climate Zone	Present	Year 1 (June 2023 - May 2024)			Year 2 (June 2024 - May 2025)			Year 3 (June 2025 - Dec 2026)		
	Bill (\$)	Bill (\$)	Change from Present (\$)	%	Bill (\$)	Change from Present (\$)	%	Bill (\$)	Change from Present (\$)	%
Territory P	\$ 179.76	\$ 188.74	\$ 8.98	5.0%	\$ 181.23	\$ 1.47	0.8%	\$ 179.88	\$ 0.12	0.1%
Territory Q	\$ 168.01	\$ 176.39	\$ 8.39	5.0%	\$ 169.39	\$ 1.38	0.8%	\$ 168.12	\$ 0.11	0.1%
Territory R	\$ 181.15	\$ 190.21	\$ 9.06	5.0%	\$ 182.64	\$ 1.49	0.8%	\$ 181.27	\$ 0.12	0.1%
Territory S	\$ 171.42	\$ 179.99	\$ 8.57	5.0%	\$ 172.83	\$ 1.41	0.8%	\$ 171.53	\$ 0.11	0.1%
Territory T	\$ 110.93	\$ 116.47	\$ 5.54	5.0%	\$ 111.84	\$ 0.91	0.8%	\$ 111.00	\$ 0.07	0.1%
Territory V	\$ 131.32	\$ 137.87	\$ 6.55	5.0%	\$ 132.39	\$ 1.08	0.8%	\$ 131.40	\$ 0.09	0.1%
Territory W	\$ 173.68	\$ 182.37	\$ 8.69	5.0%	\$ 175.10	\$ 1.43	0.8%	\$ 173.79	\$ 0.11	0.1%
Territory X	\$ 158.26	\$ 166.16	\$ 7.90	5.0%	\$ 159.56	\$ 1.30	0.8%	\$ 158.37	\$ 0.10	0.1%
Territory Y	\$ 127.81	\$ 134.23	\$ 6.42	5.0%	\$ 128.87	\$ 1.05	0.8%	\$ 127.90	\$ 0.08	0.1%
Territory Z	\$ 67.78	\$ 71.20	\$ 3.42	5.0%	\$ 68.34	\$ 0.56	0.8%	\$ 67.82	\$ 0.04	0.1%

*Average Bills are based on 2021 recorded usage. Bills do not include the biannual California Climate Credit.

CARE Electric - Hours at Minimum Wage							
Climate Zone	Present	Year 1 <i>(June 2023 - May 2024)</i>		Year 2 <i>(June 2024 - May 2025)</i>		Year 3 <i>(June 2025 - Dec 2026)</i>	
	Hours	Hours	Change from Present (hours)	Hours	Change from Present (hours)	Hours	Change from Present (hours)
Territory P	4.9	5.2	0.2	5.0	0.04	4.9	0.003
Territory Q	4.4	4.6	0.2	4.4	0.04	4.4	0.003
Territory R	5.3	5.6	0.3	5.4	0.04	5.3	0.004
Territory S	4.9	5.2	0.2	4.9	0.04	4.9	0.003
Territory T	3.0	3.1	0.2	3.0	0.02	3.0	0.002
Territory V	3.2	3.4	0.2	3.3	0.03	3.2	0.002
Territory W	5.4	5.6	0.3	5.4	0.04	5.4	0.004
Territory X	4.0	4.3	0.2	4.1	0.03	4.0	0.003
Territory Y	4.5	4.8	0.2	4.6	0.04	4.5	0.003
Territory Z	3.0	3.1	0.2	3.0	0.02	3.0	0.002

Non-CARE Electric - Hours at Minimum Wage							
Climate Zone	Present	Year 1 <i>(June 2023 - May 2024)</i>		Year 2 <i>(June 2024 - May 2025)</i>		Year 3 <i>(June 2025 - Dec 2026)</i>	
	Hours	Hours	Change from Present (hours)	Hours	Change from Present (hours)	Hours	Change from Present (hours)
Territory P	7.6	7.9	0.4	7.6	0.06	7.6	0.005
Territory Q	6.8	7.1	0.3	6.8	0.06	6.8	0.005
Territory R	8.2	8.6	0.4	8.3	0.07	8.2	0.006
Territory S	7.5	7.9	0.4	7.6	0.06	7.5	0.005
Territory T	4.6	4.8	0.2	4.6	0.04	4.6	0.003
Territory V	5.0	5.2	0.3	5.0	0.04	5.0	0.004
Territory W	8.3	8.7	0.4	8.3	0.07	8.3	0.006
Territory X	6.2	6.5	0.3	6.3	0.05	6.2	0.004
Territory Y	7.0	7.3	0.4	7.0	0.06	7.0	0.005
Territory Z	4.6	4.8	0.2	4.6	0.04	4.6	0.003

**Hours at Minimum Wage metrics are calculated using a statewide minimum wage of \$15 per hour.*

Electric-AR20 (NON-CARE)							
Climate Zone	Present	Year 1 (June 2023 - May 2024)		Year 2 (June 2024 - May 2025)		Year 3 (June 2025 - Dec 2026)	
	AR20	AR20	Change from Present (%)	AR20	Change from Present (%)	AR20	Change from Present (%)
	(A)	(C)	(C) - (A)	(D)	(D) - (A)	(E)	(E) - (A)
Territory P	11.8%	12.4%	0.6%	11.9%	0.10%	11.8%	0.01%
Territory Q	6.2%	6.5%	0.3%	6.3%	0.05%	6.2%	0.00%
Territory R	12.8%	13.5%	0.6%	13.0%	0.11%	12.9%	0.01%
Territory S	8.5%	9.0%	0.4%	8.6%	0.07%	8.5%	0.01%
Territory T	4.8%	5.0%	0.2%	4.8%	0.04%	4.8%	0.00%
Territory V	6.7%	7.1%	0.3%	6.8%	0.06%	6.7%	0.00%
Territory W	11.4%	11.9%	0.6%	11.5%	0.09%	11.4%	0.01%
Territory X	4.0%	4.2%	0.2%	4.1%	0.03%	4.0%	0.00%
Territory Y	10.5%	11.0%	0.5%	10.6%	0.09%	10.5%	0.01%
Territory Z	6.5%	6.8%	0.3%	6.6%	0.05%	6.5%	0.00%

Electric-AR20 (CARE)							
Climate Zone	Present	Year 1 (June 2023 - May 2024)		Year 2 (June 2024 - May 2025)		Year 3 (June 2025 - Dec 2026)	
	AR20	AR20	Change from Present (%)	AR20	Change from Present (%)	AR20	Change from Present (%)
	(A)	(C)	(C) - (A)	(D)	(D) - (A)	(E)	(E) - (A)
Territory P	7.6%	8.0%	0.4%	7.7%	0.06%	7.6%	0.01%
Territory Q	4.0%	4.2%	0.2%	4.1%	0.03%	4.0%	0.00%
Territory R	8.3%	8.7%	0.4%	8.3%	0.07%	8.3%	0.01%
Territory S	5.5%	5.8%	0.3%	5.5%	0.05%	5.5%	0.00%
Territory T	3.1%	3.3%	0.2%	3.1%	0.03%	3.1%	0.00%
Territory V	4.3%	4.6%	0.2%	4.4%	0.04%	4.3%	0.00%
Territory W	7.4%	7.7%	0.4%	7.4%	0.06%	7.4%	0.01%
Territory X	2.6%	2.7%	0.1%	2.6%	0.02%	2.6%	0.00%
Territory Y	6.8%	7.1%	0.3%	6.8%	0.06%	6.8%	0.00%
Territory Z	4.2%	4.4%	0.2%	4.3%	0.04%	4.2%	0.00%

Electric-AR50 (NON-CARE)							
Climate Zone	Present	Year 1 (June 2023 - May 2024)		Year 2 (June 2024 - May 2025)		Year 3 (June 2025 - Dec 2026)	
	AR50	AR50	Change from Present (%)	AR50	Change from Present (%)	AR50	Change from Present (%)
	(A)	(C)	(C) - (A)	(D)	(D) - (A)	(E)	(E) - (A)
Territory P	3.5%	3.7%	0.2%	3.5%	0.03%	3.5%	0.00%
Territory Q	2.0%	2.1%	0.1%	2.0%	0.02%	2.0%	0.00%
Territory R	3.2%	3.4%	0.2%	3.2%	0.03%	3.2%	0.00%
Territory S	2.3%	2.4%	0.1%	2.4%	0.02%	2.3%	0.00%
Territory T	1.1%	1.2%	0.1%	1.1%	0.01%	1.1%	0.00%
Territory V	1.9%	2.0%	0.1%	1.9%	0.02%	1.9%	0.00%
Territory W	3.2%	3.4%	0.2%	3.3%	0.03%	3.2%	0.00%
Territory X	1.2%	1.3%	0.1%	1.2%	0.01%	1.2%	0.00%
Territory Y	3.1%	3.3%	0.2%	3.2%	0.03%	3.1%	0.00%
Territory Z	2.1%	2.2%	0.1%	2.1%	0.02%	2.1%	0.00%

Electric-AR50 (CARE)							
Climate Zone	Present	Year 1 (June 2023 - May 2024)		Year 2 (June 2024 - May 2025)		Year 3 (June 2025 - Dec 2026)	
	AR50	AR50	Change from Present (%)	AR50	Change from Present (%)	AR50	Change from Present (%)
	(A)	(C)	(C) - (A)	(D)	(D) - (A)	(E)	(E) - (A)
Territory P	2.3%	2.4%	0.1%	2.3%	0.02%	2.3%	0.00%
Territory Q	1.3%	1.4%	0.1%	1.3%	0.01%	1.3%	0.00%
Territory R	2.1%	2.2%	0.1%	2.1%	0.02%	2.1%	0.00%
Territory S	1.5%	1.6%	0.1%	1.5%	0.01%	1.5%	0.00%
Territory T	0.7%	0.8%	0.0%	0.7%	0.01%	0.7%	0.00%
Territory V	1.2%	1.3%	0.1%	1.3%	0.01%	1.2%	0.00%
Territory W	2.1%	2.2%	0.1%	2.1%	0.02%	2.1%	0.00%
Territory X	0.8%	0.8%	0.0%	0.8%	0.01%	0.8%	0.00%
Territory Y	2.0%	2.1%	0.1%	2.0%	0.02%	2.0%	0.00%
Territory Z	1.4%	1.4%	0.1%	1.4%	0.01%	1.4%	0.00%

CARE AR20 - Areas of Affordability Concern							
<i>PUMA</i>	<i>County/City</i>	<i>Electric Climate Zone</i>	<i># Housing Units</i>	<i>Present</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>
701	Butte County (Northwest)—Chico City	PG&E P	656	12.8%	13.4%	12.9%	12.8%
702	Butte County (Southeast)—Oroville City & Paradise Town	PG&E P	5,899	12.2%	12.8%	12.3%	12.2%
1903	Fresno County (Central)—Fresno City (East Central)	PG&E R	56,910	13.8%	14.4%	13.9%	13.8%
1904	Fresno County (Central)—Fresno City (Southwest)	PG&E R	93,675	17.5%	18.4%	17.7%	17.5%
2903	Kern County (Central)—Bakersfield City (Northeast)	PG&E W	55,442	10.7%	11.2%	10.8%	10.7%
2904	Kern County (Central)—Bakersfield City (Southeast)	PG&E W	32,895	14.5%	15.2%	14.6%	14.5%
7702	San Joaquin County (Central)—Stockton City (South)	PG&E S	52,682	17.4%	18.3%	17.5%	17.4%

Non-CARE AR20 - Areas of Affordability Concern							
<i>PUMA</i>	<i>County/City</i>	<i>Electric Climate Zone</i>	<i># Housing Units</i>	<i>Present</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>
701	Butte County (Northwest)—Chico City	PG&E P	656	19.8%	20.8%	20.0%	19.9%
702	Butte County (Southeast)—Oroville City & Paradise Town	PG&E P	5,899	19.0%	19.9%	19.1%	19.0%
1903	Fresno County (Central)—Fresno City (East Central)	PG&E R	56,910	21.5%	22.6%	21.6%	21.5%
1904	Fresno County (Central)—Fresno City (Southwest)	PG&E R	93,675	27.4%	28.7%	27.6%	27.4%
2903	Kern County (Central)—Bakersfield City (Northeast)	PG&E W	55,442	16.6%	17.4%	16.7%	16.6%
2904	Kern County (Central)—Bakersfield City (Southeast)	PG&E W	32,895	22.4%	23.6%	22.6%	22.4%
7702	San Joaquin County (Central)—Stockton City (South)	PG&E S	52,682	27.4%	28.7%	27.6%	27.4%

*Areas of Affordability Concern (AAC) are denoted by the 2020 Annual Affordability Report published by the CPUC.